

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re

DELPHI CORPORATION, et al.,

Debtor.  
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Chapter 11-

Case No. 05-44481 (RDD)

(Jointly Administered)

**AFFIDAVIT OF HOWARD J. GROSSMAN IN SUPPORT OF  
MOTION OF JPMORGAN CHASE BANK, N.A. AND BRAZEWAY, INC. FOR RELIEF  
FROM RECONSIDERATION OF ORDER MODIFYING CLAIMS ASSERTING  
RECLAMATION (TWENTY-FIRST OMNIBUS OBJECTION)**

STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF MONROE     )

Howard J. Grossman, having been duly sworn according to law, deposes and  
says as follows:

1. I am a Vice President and Assistant General Counsel of JPMorgan Chase Bank, N.A. ("JPMorgan").
2. I submit this affidavit in support of the Motion of JPMorgan Chase Bank, N.A. and Brazeway, Inc. for Relief from Reconsideration of Order Modifying Claims Asserting Reclamation (Twenty-First Omnibus Objection).
3. Except as otherwise stated, the facts set forth in this Affidavit are based on my personal knowledge, and if called to testify, I would and could testify competently to the facts set forth herein.
4. As part of its ordinary course of business, JPMorgan regularly purchases and sells claims against debtors in Chapter 11 bankruptcy proceedings and I


regularly represent both JPMorgan's Trading Desk and Trade Claim Documentation Group in connection with bankruptcy claims.

5. On November 1, 2007 a colleague in the JPMorgan Legal Department who received a copy of the Debtor's Proposed Twenty-Third Omnibus Hearing Agenda and Omnibus Reply in Support of its Twenty First Omnibus Objection called me because he knew I worked with the Trading Desk and because saw JPMorgan's name listed in the exhibits to those documents. I asked the colleague to forward the papers and received them the next day on November 2, 2007

6. Upon my receipt of the documents, JPMorgan and its outside counsel contacted Brazeway and its outside counsel, and JPMorgan and Brazeway began the process that resulted in the filing of the Motion.

  
Howard J. Grossman

SWORN to and SUBSCRIBED to  
before me this 20 day  
of November, 2007

  
Notary Public

My Commission Expires

RICHARD L. SMITH  
Notary Public, State of New York  
Qualified in Monroe County  
Commission Expires Dec. 30, 2008